

Exhibit “B”

Michael Murphy

From: Michael Murphy
Sent: Tuesday, August 20, 2024 9:44 AM
To: Zachary Hansen; Michael Murphy, Jr.; Robie Atienza-Jones; Carmen
Cc: Bryan Sullivan; Salvaty, Paul B.; gaellis@winston.com;
AbbeLowellPublicOutreach@winston.com
Subject: Re: Biden v. Byrne (2:23-cv-09430) - Meet and Confer Letter

Hi Zachary:

I am out of town but have some time to address the discovery and other issues pending as follows:

1. On August 9, 2024 we provided you with our client's verified further responses to your special interrogatories. There is nothing more to provide you. We do not list Michael Flynn as a witness in those responses. We will serve you with an updated Rule 26 disclosure and will file it on Monday. You have Mr. Flynn's address on your subpoena.

2. We are waiting for the court to sign the order. We will then produce the tapes and our remaining documents. Alternatively, we will produce them if the judge rejects the stipulation. We are waiting to receive her ruling.

3. You were sent three e-mails by me last Saturday. Those deal with Mrs. Biden's deposition, the psychological testing of your client and the contact information for the witnesses identified in your client's responses and listed in your Rule 26 disclosure statement. Please respond to each of these e-mails by close of business today with a meaningful response or provide me with your IDC statement and dates when you are available to attend a single IDC on these issues. I will then set up the IDC with our IDC statements given to the judge if we cannot get these issues promptly resolved.

I look forward to hearing from you soon.

Very truly yours,

Michael C. Murphy, Esq.

From: Zachary Hansen <zhanzen@earlysullivan.com>

Sent: Tuesday, August 20, 2024 9:31:02 AM

To: Michael Murphy, Jr. <michael.jr@murphlaw.net>; Robie Atienza-Jones <rjones@earlysullivan.com>; Michael Murphy <michael@murphlaw.net>; Carmen <Carmen@murphlaw.net>

Cc: Bryan Sullivan <bsullivan@earlysullivan.com>; Salvaty, Paul B. <PSalvaty@winston.com>; gaellis@winston.com <gaellis@winston.com>; AbbeLowellPublicOutreach@winston.com <abbelowellpublicoutreach@winston.com>

Subject: RE: Biden v. Byrne (2:23-cv-09430) - Meet and Confer Letter

Michael,